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Ry. Co., 52 Fed., 904. Though the bill of lading in the principal case purports to contain an agreed valuation, yet, if, as the Court construes it, it is an attempt to limit liability, the case is correctly decided. When all the circumstances surrounding the formation of the contract have been fully shown, the question whether there was an agreed valuation or an attempt to limit liability may properly and fairly be left to the jury.

DEDICATION—PLATS—PARKS—SALES OF LOTS—REVOCATION.—TOWN OF VINTON *v.* LYONS ET AL., 60 So. (La.), 54.—*Held*, that the recording of a plat with a vacant block marked "park" and the sale of lots according to the plat, is an irrevocable dedication of the park to public use.

The word "park" written on the recorded plat and lots being sold in accordance with the plat constitutes dedication of such ground to park purposes. *Florida East Coast Ry. Co. v. Worley*, 49 Fla., 297. Dedication will be consummated when lots are sold at auction after the announcement that a certain part will be set aside as a public park. *Borough of Belwar v. Barnett*, 72 Atl. (N. J.), 77. The principle is that the grantor is estopped to deny the existence of the easement. *Clark v. Elizabeth*, 40 N. J. L., 172. The title created in the municipality is that of an easement. In a few cases where the municipality has not as yet been created it is held that the title is that of a fee simple which is in abeyance during the interim between the time of the sale of the lots and the creation of the municipality. *Stephenson v. Lewis*, 244 Ill., 147. But no amount of laying out and planning will effect a dedication unless lots are sold on the strength of it. *Kruger v. Constable*, 116 Fed., 722. The decision in the title case is entirely sound.

ELECTIONS—ELECTORAL RESIDENCE—RIGHT OF STUDENTS TO VOTE.—HOLMES ET AL. *v.* PINO ET AL., WHITAKER ET AL. *v.* SAME, 60 So. (La.), 78.—*Held*, that the provision of Article 208 of the Constitution of 1898 that, "for the purpose of voting, no person shall be deemed to have gained a residence, by reason of his presence, or lost it by reason of his absence, while a student at any institution of learning," does not disqualify a student of full age from acquiring an electoral residence in the parish where such an institution is located. Each case must be determined by its own particular facts.

The weight of authority shows that there is no special rule for determining the residence of students for election purposes. The same rules that determine the domicile of other persons apply to them. *Wickham v. Coyner*, 30 Ohio Cir. Ct. R., 765. The right to vote is dependent upon an actual and not an imaginary residence, and it is not a matter of choice. *People v. Ellenbogen*, 114 N. Y. App., 182. The rule laid down in *Welch v. Shumway*, 232 Ill., 54, that a student supporting himself entirely by his own efforts, not subject to parental control, and who regards the place